


Rachel Loftin

02/26/97 01:50 PM

To: Jim Hanson
cc: Betsy Curnow
Subject: Re: First Region 9 "Discomfort Letter" 

Jim - Here's my 2 cents on the "Discomfort Letter". My comments are based on our discussions about looking for data that is usable to re-score and NFA or archive the site...

We should strengthen the last sentence in the 2nd paragraph to indicate that the additional sampling for VOCs is needed from locations on and surrounding the Rayo property.

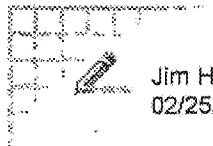
Depending on the approach that will be used for the sampling (e.g., one event, or phased sampling) you may want to indicate what type of sampling is being requested. To re-score the site, data from soils and shallow groundwater would be needed. Some of this may be available from RWQCB which could streamline what the RP would need to do. They may also want to get soil gas samples since the VOCs may not show up in the soils even though they are in groundwater. The soil gas data could be used to establish the absence or presence of the VOCs on site. The soil gas isn't necessary for re-scoring, but could clear this RP.

? How were the 3 sampling locations identified? If comparable background samples are not currently available, they will need to collect samples from areas that would not be expected to be contaminated or impacted from site activities. Its also possible that the locations identified in the letter could change after a review of their existing data as compared to the data available from the CERCLIS file and RWQCB. Maybe we could say these are tentatively identified locations.

Do we know what RWQCB's current involvement is?

Rachel

Jim Hanson



Jim Hanson
02/25/97 05:58 PM

To: Bill Keener, Rachel Loftin, Steve Simanonok
cc: Betsy Curnow
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Attorney Client / Ex. 5